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December 14, 2023

VIA ECF

Hon. J. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Weatherford Switzerland Trading and Development GMBH et al v. Petróleos de Venezuela, S.A. et al*, Case No. 1:23-cv-10703

Dear Judge Liman:

We represent the defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A. (together, "Defendants") in the above-referenced action. Pursuant to Your Honor's Individual Practices in Civil Cases, we to request the Court enter the below proposed briefing schedule on Plaintiffs' pending motion for summary judgment. Plaintiffs Weatherford Switzerland Trading and Development GMBH and Weatherford Latin America, S.C.A (together, "Plaintiffs") join in this request.

Plaintiffs commenced this action in New York state court by filing a motion for summary judgment in lieu of complaint, pursuant to CPLR 3213 (Dkt. 1-2) (the "Motion"). Defendants removed this action to this Court on December 7, 2023 (Dkt. 1). Defendants did not file an opposition to Plaintiffs' Motion prior to removal.

Plaintiffs and Defendants have now met and conferred regarding a briefing schedule on the Motion, and request the Court enter the following schedule:

- Defendants' Opposition to the Motion is due January 29, 2024;
- Plaintiffs' Reply in Further Support of the Motion is due February 20, 2024.

Respectfully submitted,



Kevin P. Broughel
of PAUL HASTINGS LLP